

JAP:DCP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**14 M 255**

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 1546(a))

MUHAMMAD ABBAS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

CONSTANTINA WILLIAMSON, being duly sworn, deposes and states that she is a Special Agent with the United States Department of State, Diplomatic Security Service (“DSS”), duly appointed according to law and acting as such.

On or about March 18, 2014, within the Eastern District of New York and elsewhere, the defendant MUHAMMAD ABBAS did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546(a))

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with DSS and have been with DSS since August 2013. I have been involved in the investigation of cases involving visa fraud, passport fraud

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

and identity theft. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file and from reports of other law enforcement officers involved in the investigation, including but not limited to officers of the United States Customs and Border Protection ("CBP").

2. On March 18, 2014, the defendant MUHAMMAD ABBAS arrived at John F. Kennedy International Airport in Queens, New York, on Pakistani International Airlines flight number 721 from Lahore, Pakistan via Manchester, England. The defendant presented a valid Pakistani passport no. CR1012141 and a B-1/B-2 United States entry visa with foil no. F5704544 in the name of MUHAMMAD ABBAS to a CBP officer. The defendant's B-1/B-2 visa was issued by the United States Embassy in Islamabad, Pakistan on June 17, 2013.

3. The defendant's visa application, which was submitted in May 2012, stated that he was married and worked for "M N Trading Company" in Lahore, Pakistan and that his duties were "9 AM to 5 PM." The visa application stated that the purpose of the defendant's trip to the United States was to visit Detroit, Michigan. The visa application listed a home address on "Wahdat Colony" in Lahore.

4. The defendant MUHAMMAD ABBAS was interviewed for admissibility by CBP officers. Prior to the interview, CBP Officers searched the defendant's bag and wallet and was found to be in possession of a business card for "M&N Trading Company," listing the defendant as the "proprietor." During the interview, which was conducted in Urdu with the assistance of a CBP Officer translating, the defendant MUHAMMAD ABBAS initially stated, in sum and substance and in relevant part: that he was traveling to the United States to visit

Detroit for business purposes; that he would be driving to Detroit from New York; that he didn't have many details of his trip to Detroit because his manager had made the reservations for him and that he only knew the first name of his manager. After additional questioning from CBP officers, the defendant admitted that he was not the owner of "M&N Trading Company" and did not work there. The defendant stated that he was an unmarried tailor who worked from his home. He admitted that the home address was different than the address listed on the visa application. The defendant admitted that much of the information contained in the visa application was false and had been provided by another individual, who he had paid for his assistance with the application.

5. The CBP officers notified an agent from DSS. With the assistance of a CBP officer translating, the DSS agent advised the defendant of his Miranda rights, which he said he understood and which he waived both orally and by signing an Urdu-language waiver form. In the subsequent interview the defendant MUHAMMAD ABBAS admitted, in sum and substance and in part, that: (1) that he was employed as a tailor making women's dresses; (2) that he was unmarried; (3) that he had paid another individual ("Individual #1") 65,000 Pakistani rupees for assistance in fabricating his U.S. visa application and securing a visa; (4) that Individual #1 had provided him with a business card and letter of employment for "M&N Trading Company" as well as false bank statements; (5) he was traveling to the United States to work and had no intention of visiting Detroit as set forth on the visa application; (6) that he had been coached by Individual #1 on how to present the fabricated story during his visa interview; and (7) the defendant presented this fabricated story during his visa interview at the U.S. Embassy in Islamabad, Pakistan on June 17, 2013.

WHEREFORE, your deponent respectfully requests that the defendant  
MUHAMMAD ABBAS be dealt with according to law.



CONSTANTINA WILLIAMSON  
Special Agent  
United States Department of State  
Diplomatic Security Service

Sworn to before me this

19th day of March, 2014

RELSKY

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NEW YORK